

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

FILED

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DAVID CREWS, CLERK
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Deputy

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 3:17CR 016

RICKEY ROBERTSON, a.k.a "SLICK RICK"
LADARIUS E. JACKSON, a.k.a "DEE," a.k.a. "DEE DON"

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy to Commit Sex Trafficking)

The Conspiracy

1. From on or about December 1, 2015 until on or about December 31, 2015, in the Northern District of Mississippi and elsewhere, defendants RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," a.k.a. "DEE DON," and others known and unknown to the Grand Jury, knowingly and intentionally conspired and agreed with each other, in and affecting interstate commerce, to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, and benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained the following individuals, as well as others, Victim 1 ("K.M.") and Victim 2 ("C.E.") (collectively, "the Victims"), knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the Victims to engage in commercial sex acts, all in violation of Title 18, United States Code, Sections 1591 (a)(1) and (b)(1).

Manner and Means

2. It was part of the conspiracy that RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," and others known and unknown to the Grand Jury, received monies and other things of value by having Victim 1 and Victim 2 engage in commercial sex acts.

3. It was further part of the conspiracy that RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," and others known and unknown to the Grand Jury, targeted vulnerable adult females in the Memphis, Tennessee area to engage in commercial sex acts.

4. It was further part of the conspiracy that RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," and others known and unknown to the Grand Jury, provided money, food and other things of value to Victim 1 and Victim 2 in exchange for performance of commercial sex acts.

5. It was further part of the conspiracy that RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," and others known and unknown to the Grand Jury, used violence and the threat of violence to prevent Victim 1 and Victim 2 from escaping their commercial sex operation.

6. It was further part of the conspiracy that RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," and others known and unknown to the Grand Jury, used vehicles, public highways, hotels, telephones and the internet to facilitate the commercial sex acts.

7. It was further part of the conspiracy that RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," and others known and unknown to the Grand

Jury, arranged for the transportation of and transported Victim 1 and Victim 2 from and between Tennessee and Mississippi with the intent that Victim 1 and Victim 2 would engage in prostitution.

Overt Acts

8. During and in furtherance of the conspiracy and to affect the objects of the conspiracy, at least one of the co-conspirators committed at least one of the following overt acts on or about the dates listed.:

a. At some point on or about January 2015, RICKEY ROBERTSON, a.k.a. "SLICK RICK," recruited Victim 1 to engage in commercial sex acts.

b. At some point on or about January 2015, RICKEY ROBERTSON, a.k.a. "SLICK RICK," instructed Victim 1 to walk an area in Memphis, Tennessee known for prostitution in order to attract commercial sex customers.

c. At some point after January 2015, RICKEY ROBERTSON, a.k.a. "SLICK RICK," physically assaulted Victim 1 and put a gun to her head, threatening to kill her and her child if she attempted to leave.

d. From on or about January 2015 to on or about December 2015, RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," and others known and unknown to the Grand Jury, posted pictures of Victim 1 and Victim 2 on an internet site known as "Backpage" to advertise commercial sex acts.

e. From on or about August 2015 to on or about December 2015, RICKEY ROBERTSON, a.k.a. "SLICK RICK," LADARIUS E. JACKSON, a.k.a. "DEE," and others known and unknown to the Grand Jury, transported Victim 1 and Victim 2 from Memphis, Tennessee to Oxford, Mississippi to engage in commercial sex acts.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

(Sex Trafficking)

9. From on or about January 2015 to on or about December 30, 2015, in the Northern District of Mississippi and elsewhere, the defendant RICKEY ROBERTSON, a.k.a. “SLICK RICK,” aided and abetted by others known and unknown to the Grand Jury, in and affecting interstate commerce, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain Victim 1 (“K.M.”) knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Victim 1 to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 2 and 1591(a)(1) and (b)(1).

COUNT THREE

(Transportation to Engage in Prostitution)

10. On or about December 14, 2015, in the Northern District of Mississippi and elsewhere, defendants RICKEY ROBERTSON, a.k.a. “SLICK RICK,” and LADARIUS E. JACKSON, a.k.a. “DEE,” a.k.a. “DEE DON,” aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly and intentionally Transport Victim 1 (“K.M.”) and Victim 2 (“C.E.”) in interstate commerce, from Tennessee to Mississippi, with intent that the Victims engage in prostitution and sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2 and 2421.

COUNT FOUR

(Transportation to Engage in Prostitution)

11. On or about December 31, 2015, in the Northern District of Mississippi and elsewhere, defendants RICKEY ROBERTSON, a.k.a. "SLICK RICK," and LADARIUS E. JACKSON, a.k.a. "DEE," a.k.a. "DEE DON," aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly and intentionally Transport Victim 1 ("K.M.") in interstate commerce, from Tennessee to Mississippi, with intent that Victim 1 engage in prostitution and sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2 and 2421.

A TRUE BILL

/s/ Signature Redacted
FOREPERSON


UNITED STATES ATTORNEY